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December 27, 2024

Hon. Arun Subramanian  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, New York 10007

Re: Citibank, N.A., as Trustee For The Benefit Of  
The Holders Of CF-2020 P1 Mortgage Trust  
Commercial Mortgage Pass-Through Certificates,  
Services 2020 1 v. Hello Flatbush LLC et al  
Docket No. 23-cv-10920 (AS)

Dear Judge Subramanian:

Further to the Court's order of December 20, 2024, I am pleased to report to the Court that today I sent two large Zip files to counsel for Hello Flatbush, LLC ("Hello Flatbush") containing all available documents and emails responsive to the subpoena and document request which were served, respectively, upon Fink & Zelmanovitz, P.C. and defendant Eli Karp by counsel for Hello Flatbush.

Regrettably, I was not able to comply with the noon Court deadline of today because a third-party litigation vendor was providing all of the documents and emails and I was only able to access the files today after spending over an hour with customer service for the third-party vendor and obtaining remote access by a customer service personnel to assist with the downloading of the documents.

I am sure the Court can appreciate that with the Christmas holiday on December 25, 2024, and with December 26, 2024, being a day when some businesses are closed, all these circumstances impacted on the timeliness of the production, as provided for in the Court's order.

Significantly, Mr. Judah A. Zelmanovitz, Esq. had been away in Isreal for some time. The absence of Mr. Zelmanovitz impinged upon his ability to provide responsive documents to the subpoena and materially contributed to the delay in the production.

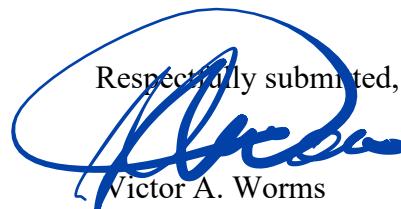
In any event, both Mr. Zelmanovitz and Mr. Karp are prepared to sign sworn statements confirming that they have made a diligent search for documents responsive, respectively, to the subpoena and the document request and that they have provided all documents responsive to the subpoena and the document request.

Counsel for Hello Flatbush has indicated in his letter to the Court of December 20, 2024 that documents relating to Mr. Karp's authority to sign the transaction documents and documents relating to due diligence performed in connection with the underlying loan transaction were not provided.

As indicated previously, Mr. Zelmanovitz and Mr. Karp have completely and fully responded to the subpoena and the document request that were served upon them by counsel for Hello Flatbush.

To be sure, during the depositions of Mr. Zelmanovitz and Mr. Karp, counsel for Hello Flatbush will be able to question both Messrs. Zelmanovitz and Mr. Karp concerning all matters relating to the underlying loan transaction.

To that end, I consent to the application by counsel for Hello Flatbush to extend the discovery deadline to the end of March 2025.

Respectfully submitted,  
  
Victor A. Worms

All counsel by ECF